

REMARKS/ARGUMENTS

Applicants respectfully withdraw Claims 1-36 with traverse and request favorable reconsideration of Claims 37-55. In the Office Action dated March 31, 2005, the Examiner, *inter alia*:

- 1) acknowledges Applicants' election with traverse of Claims 37-55; and
- 2) rejects Claims 37-55 under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 5,100,732 to *Benefiel* (the "Benefiel reference").

Applicants respectfully address these items below.

Acknowledgment of Applicants' Election with Traverse:

In the Office Action, the Examiner acknowledges Applicants' election with traverse of Claims 37-55. Although the Examiner deemed the restriction requirement proper, Applicants maintain that the examination of Claims 1-18 and 19-36 would not impose an additional burden on the Patent Office under 35 U.S.C. §121.

Rejection under 35 U. S. C. § 103(a) as allegedly being unpatentable over the *Benefiel* reference:

In the Office Action, the Examiner rejects Claims 37-55 under §103(a) as being unpatentable over the *Benefiel* reference. Applicants respectfully disagree.

Claim 37:

Specifically, Applicants submit that the *Benefiel* reference does not disclose or make obvious all the necessary elements as required by Claim 37. Although the Examiner cites to various sections of the reference for support, Applicants respectfully submit that the *Benefiel* reference does not teach or make obvious, for example, a method of producing channel letter coil comprising disposing a first reflective material upon a first surface of the substrate and disposing a second reflective material upon the first reflective material, as required by Claim 37. Moreover, there is no teaching, suggestion or motivation in the *Benefiel* reference for the use of *any* reflective materials, let alone disposing a first and second reflective material as required by Claim 37. Even assuming that the pigmented base coat taught by the

Benefiel reference is of a reflective nature (which it is not), the Benefiel reference teaches covering the pigmented base coat with a clear or transparent outer top coat (which is clearly not a reflective material). (*See e.g.*, Benefiel, col. 4, lines 54-58 and col. 7, lines 6-7). In addition, contrary to the Examiner's suggestions, the "excellent painted appearance" resulting from affixing a precoated, formed aluminum veneer to automotive body skin components is not accomplished by disposing a reflective material onto a substrate or onto another reflective material as is required by Claim 37. (*Id.* at col. 8, lines 15-21).

Accordingly, the Benefiel reference fails to render the Applicants' invention obvious. There is also no suggestion or motivation in the Benefiel reference to prompt one of ordinary skill to selectively combine and *seek out* other elements as required by Claim 37. Applicants therefore respectfully submit that Claim 37 is patentably distinguishable over the art cited and request favorable reconsideration and withdrawal of the rejection to Claim 37.

Claims 38-55:

Claims 38-55 ultimately depend from allowable Claim 37 and thus are also allowable for the reasons set forth above. Accordingly, the Benefiel reference fails to render the Applicants' invention obvious. There is also no suggestion or motivation in the Benefiel reference to prompt one of ordinary skill to selectively combine and seek out elements as required by Claims 38-55. Accordingly, Applicants submit that Claims 38-55 are patentably distinguishable over the art cited and respectfully request favorable reconsideration and withdrawal of the rejection to Claims 38-55.

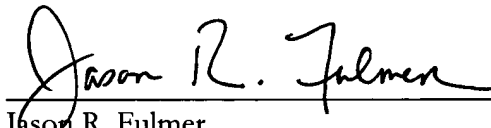
CONCLUSION

In light of the remarks and arguments presented above, Applicants respectfully submit that the pending and amended claims in the Application are in condition for allowance. Favorable reconsideration and allowance of Claims 37-55 is therefore respectfully requested.

Applicants hereby authorize the Commissioner to charge any fees, other than the issue fee, that may be required by this paper to Deposit Account 07-0153. If the Examiner has any questions or comments, or if further clarification is required, it is requested that the Examiner contact the undersigned at the telephone number listed below.

Respectfully submitted,

GARDERE WYNNE SEWELL LLP

A handwritten signature in black ink, reading "Jason R. Fulmer", is written over a horizontal line.

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